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May 5, 2011

*Via ECF and Facsimile to (973) 645-4412*

The Honorable Michael A. Shipp, U.S.M.J.  
The United States District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & United States Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Reyes v. Keith Machinery Corp., et al.*  
Civil Action No.: 2:09-CV-5309  
Our File No.: 348-1033

Dear Judge Shipp:

This firm represents defendant Keith Machinery Corp. ("KMC") in the above-referenced matter. We are writing to respectfully request a 45-day extension of the deadline to serve rebuttal expert reports and the remaining discovery deadlines. This request is based upon the fact that the lead attorney on this matter, Scott Haworth, was recently in a severe bicycle accident and is currently hospitalized. We do not yet have confirmation of the date of his discharge but his injuries are significant and will require a substantial recovery period. We have obtained consent from defendant Littleford, and as of the time of this correspondence, have not yet heard from plaintiff. However, we wanted to apprise the court of the situation as soon as possible.

In particular, we request that the deadlines be extended as follows:

- All rebuttal reports shall be produced by July 1, 2011;
- All expert depositions shall be completed by July 28, 2011; and <sup>at 11:30 am</sup>
- The final pretrial conference shall be held on September 9, 2011; and the joint proposed pretrial order shall be submitted to the Court by August 25, 2011.

In the alternative, we request a scheduling conference before Your Honor to discuss this issue.

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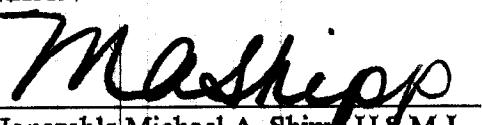
We appreciate Your Honor's time and attention to this matter.

Respectfully submitted,



Abigail Bowen  
Haworth Coleman & Gerstman, LLC

So Ordered:



The Honorable Michael A. Shipp, U.S.M.J.  
Dated: May 9, 2011

cc:

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